

**USDA Child Nutrition Programs  
Administrative Review Summary Report**

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**School Food Authority:** DePere Unified School District    **Agency Code:** 5-1414

**School(s) Reviewed:** DePere Middle School and Heritage Elementary School

**Review Date(s):** 2/6/17 – 2/8/17

**Date of Exit Conference:** 2/8/17

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage [dpi.wi.gov/school-nutrition/national-school-lunch-program/financial](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial), scroll down to the unpaid meal charges section.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at DePere Unified School District for the courtesies extended to us during the on-site review. Thank you to the Food Service Director, the Assistant Food Service Manager, the Determining Official, Business Director, and Food Service Staff for being available when answering questions and providing additional information when necessary. Administrative and Food Service staff were very receptive to recommendations and guidance. In addition, thank you for taking the time

to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. It has been a pleasure working with you all this week.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Commendations**

1. The Determining Official/Verifying Official is doing a fantastic job for her first year in those roles. Keep up the great work!
2. The December lunch claim was validated and consolidated correctly.
3. Direct Certification (DC) has been run the required amount of times for the school year. The Determining Official does a great job running Direct Certification multiple times throughout the school year.
4. The correct letter templates regarding Free and Reduced Meal Applications, Verification, and Direct Certification were used.
5. Verification was done completely and well documented. It was completed by November 14. The Verification Collection Report was before the February 1 deadline.

#### **Technical Assistance and Program Requirement Reminders**

1. For the Verification Collection Report, only report the number of applications on file as of October 1 in Section 4. Report the number of Directly Certified students as of the last operating day in October in Section 3.
2. The dates of Direct Certification runs are the start dates of eligibility for students that match on the DC runs as S, T, O, or E codes.
3. Students that match as E codes on the DC runs cannot extend benefits to any other household members. Homeless students may not extend benefits to any other household member as well.

#### **Findings and Corrective Action Needed**

☐ **Finding #1:** One household is receiving free benefits that should have originally determined as reduced price eligible. There was a calculation error on the application.

- **Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 2/8/17. No further action required.

### **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

#### **Commendations and Appreciations**

Sincere thanks to Food Service Director, Assistant Food Service Director, and school nutrition professionals of De Pere Middle School and Heritage Elementary School. We appreciate your time and efforts spend preparing for and participating in the on-site review. All kitchens and service areas

were clean, well-organized, and colorful. Great job on your farm to school efforts! Though many staff members are new to their roles, they demonstrate sound knowledge of child nutrition program requirements and eagerness to learn and improve existing programs. You were all a pleasure to work with!

## **Technical Assistance and Program Requirement Reminders**

### **Weight versus Volume**

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. This will be the easiest way to make sure the meal pattern is being met. For meat/meat alternate and grain items crediting information should be recorded in ounce equivalents. Please ensure weight and volume are not being used interchangeably for crediting purposes. A portion control webcast, which describes portion control techniques and explains the difference between weight and volume, is available from the School Nutrition Team at <https://dpi.wi.gov/school-nutrition/training/webcasts#pc>. Earn fifteen minutes of continuing education credit by viewing the webcast.

### **Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient (e.g. parfaits, wraps, sandwiches). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates were left onsite and can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

While there are standardized recipes written for parfaits, wraps, and sandwiches, notes on production records and onsite observations revealed they are not consistently followed. Many of the sandwich and wrap recipes include variations or alternative ingredients (e.g. thin sliced turkey, thick sliced turkey, or diced chicken). If variations, alternative ingredients, or optional ingredients alter the yield, meal pattern crediting, or nutrient content, or if different procedures are used, the recipe must be tested and re-standardized.

### **Production Records**

Production records are intended to be useful tools to record information prior to production, during production, and following production. All sections of the production record must be filled in completely each day. Daily production records show portion sizes of meal components were appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.

The breakfast and lunch production record templates currently in use are missing required information. While there is no required template, there are examples on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. The current templates must be updated to include the following required information for continued use:

- Menu item with recipe name/reference number or product name/description
- Planned number of portions (breakfast template only)

- Total number of purchase units (2-No 10 cans, 10 lb case, 2-96 count case) prepared (breakfast template only)

## **Documentation**

Processed products, such as imitation crabmeat, require a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number, weights of raw and cooked ingredients, portion size, statement of contribution to meal pattern requirements, and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead, and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson.) If a processed item does not have a valid CN label or PFS, it may not be credited when served as part of the USDA's Child Nutrition Programs. Additionally, remember to collect new product labels annually, as well as to update records when new products are purchased and when product formulations change throughout the school year. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. Please ensure crediting information, whether recorded on production records or separately, is accurate and in agreement with supporting documentation. More information regarding crediting documentation can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.

## **Signage**

Signage helps students understand what components make up a reimbursable meal. Please add a statement to your current signage that states the student must take at least  $\frac{1}{2}$  **cup** fruit, vegetable, or fruit/vegetable combination.

## **Extras**

Extra, non-creditable items are offered frequently. These foods do not credit toward the meal pattern, but they must be included in the dietary specifications. While occasional use of such foods is allowable and can be a nice incentive for participation, they are counting toward calorie, saturated fat, and sodium limits, without fulfilling any of the required components. It can be very difficult to stay within the dietary specification limits. These foods are also adding to the cost of the meal without providing the value of being a creditable component for a reimbursable meal.

## **Offer versus Serve**

Food service staff at Heritage Elementary School were unclear about the Offer Versus Serve (OVS) requirements for lunch. Although all students observed took a reimbursable meal, staff must fully understand the OVS requirements. At lunch, students were frequently sent back to select additional fruits or vegetables, even when their trays already had three of five required components under Offer vs Serve.

Continue to offer a variety of food choices to students; this increases the likelihood that students will select the foods and beverages they prefer, which increases consumption and reduces waste. However, it is important to recognize that offering a variety of choices within the food components and items is different from OVS.

Under OVS at lunch, a student must take at least three components in the required quantities. One selection must be at least  $\frac{1}{2}$  cup (total) from either the fruits or vegetables component. Depending on the planned menu, the student may need to select more than one food item to have the minimum quantity needed for a component to be credited.

If only three components are selected, and two of these are fruit and vegetable, the student may only select the ½ cup portion for the fruit OR vegetable. For the other two components, the student must select at least the minimum daily required serving of the components for them to be counted. Three food components are required for an adequate nutritious meal for students and to warrant the Federal reimbursement. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum ½ cup fruit and/or vegetable serving, it is the student's choice to select or decline a food component.

We strongly encourage you to review the Offer Versus Serve Guidance Manual, available on our webpage at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>.

## **Smart Snacks**

The [Smart Snacks Final Rule](#), published in the Federal Register on July 29, 2016, finalizes science-based nutrition guidelines for competitive foods sold on the school campus during the school day that were established in the Interim Final Rule (July 1, 2014). Foods and beverages sold in schools must meet both the general standards and the nutrient standards outlined in the final rule if they do not qualify for an exemption.

Under the General Standards, entrées, snacks, and sides must meet one of the following criteria:

- Be a whole grain-rich product
- Have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient
- Be a combination food with at least ¼ cup fruit and/or vegetable

We recommend using the [Smart Snacks Product Calculator](#) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Alternatively, items that do not meet Smart Snacks criteria may be sold beginning thirty minutes after the end of the instructional school day.

The Gatorade and Propel beverages sold a la carte in the middle school cafeteria are not allowable. Only plain water (all sizes), low-fat or fat free milk (≤12 ounces), or 100% juice (≤12 ounces) may be sold to middle school students. Also, two noncompliant products were identified in the vending machine. Both products exceed the sodium standard of ≤200 milligrams for snacks or sides. The student council, which profits from the vending machine, is responsible for ensuring compliance with Smart Snacks standards. Nutrition facts labels, and other supporting documentation such as product formulation statements or Smart Snacks Product Calculator results, should be kept on file. Vending machine contents should be evaluated and re-evaluated regularly. Please work with the vending company so only Smart Snacks compliant products are stocked. Remaining inventory of the noncompliant products may be sold. Do not order or purchase them going forward.

## **Training**

We recommended that anyone involved with the school meals program attend DPI training classes. Classes are offered over the summer and at select other times during the year. Classes are provided free of charge. Numerous webcasts are also available online. Travel and meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including verification, free/reduced applications, civil

rights, USDA Foods, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the DPI website at <http://dpi.wi.gov/school-nutrition/training>.

### **Findings and Corrective Action Needed**

**☐ Meal Pattern Finding #1:** Insufficient crediting documentation for imitation crabmeat.

**Required Corrective Action:** Please submit product formulation statements (PFS), child nutrition (CN) labels, or standardized recipes for these five items. If proper documentation cannot be obtained, discontinue using these products for school meals and submit crediting documentation for replacement products.

**☐ Meal Pattern Finding #2:** Gatorade and Propel beverages sold a la carte in the middle school cafeteria as well as Wheat Thins Veggie Toasted Chips and Snyder's Honey Wheat Braided Twists from the vending machine are noncompliant with Smart Snacks standards.

**Required Corrective Action:** The Food Service Director emailed the vending company. First, she requested the timer on the Gatorade vending machine be reset to 3:30 PM, which is thirty minutes after the end of the instruction school day. Next, she requested the noncompliant products in the snack vending machine be replaced with compliant products or that the timer be reset to 3:30 PM. **No further corrective action required.**

**☐ Meal Pattern Finding #3:** Weekly minimum requirements for the meat/meat alternate and grain components are not being met for the 6-8 age/grade group as a result of a one ounce equivalent menu item (e.g. Uncrustable, bagel/cream cheese/cheese stick) offered each day. Weekly minimum requirements for the meat/meat alternate component is not being met for the K-5 age/grade group as a result of an inaccurate standardized recipe for the yogurt parfait.

**Required Corrective Action:** Please submit an updated menu and statement describing how you will alter the menu to meet the requirements going forward. Also submit an updated standardized recipe for the yogurt parfait which reflects actual ingredients, portion sizes, and crediting information.

**☐ Meal Pattern Finding #4:** Missing component during the week of review. Students who selected an alternate entrée on Friday, December 16, did not have access to the grain component. Breads, buns, and tortillas included with the wraps and sandwiches are intended as extras and do not credit toward the meal pattern. Salads do not include a creditable grain. The daily minimum requirement is one ounce equivalent of grain. The grain component was missing from four other reimbursable meals offered during the month of review, and a cycle menu is utilized.

**Required Corrective Action:** Please submit an updated menu and statement describing how you will alter the menu to meet the requirements going forward. **Incomplete meals claimed for reimbursement during the week of review may be subject to fiscal action.**

**☐ Meal Pattern Finding #5:** Current production records do not include all required information and are not being filled in completely.

**Required Corrective Action:** Update production records to include the following missing information: menu item with recipe name/reference number or product name/description; planned number of portions (breakfast template only); and total number of purchase units (2-No 10 cans, 10 lb case, 2-96 count case) prepared (breakfast template only). **Please submit two full days of completed production records, updated to reflect these requirements.**

❑ **Meal Pattern Finding #6:** Offer vs Serve is not being properly implemented at lunch.

**Required Corrective Action:** Watch the Offer Versus Serve webcast on the DPI School Nutrition Team webpage, located at the following address: <http://dpi.wi.gov/school-nutrition/training/webcasts#cyc>. **Please submit a roster or checklist indicating all staff have viewed the webcast.**

❑ **Meal Pattern Finding #7:** The required 1/2 cup fruit, vegetable, or fruit vegetable combination statement is missing from posted signage.

**Required Corrective Action:** Add a statement to your current signage that states the student must take at least ½ cup fruit, vegetable, or fruit/vegetable combination. **Submit a photo of updated signage.**

### **3. RESOURCE MANAGEMENT**

#### **Commendations**

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool will be up on the School Nutrition website soon.

#### **Comments/Technical Assistance/Compliance Reminders**

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required.
2. USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges.

For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> .

For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

By deciding to claim the alternate meals, the meals must meet meal pattern. The difference between the cost and the reimbursement of the reimbursable meals may be absorbed by the food service account.

### **4. GENERAL PROGRAM COMPLIANCE**

#### **Commendations**

1. The Food Safety plan was well done and had all of the required components.



2. The first Food Safety Inspection was completed in October for both reviewed sites and the next inspections will be after the New Year sometime.
3. On-site monitoring forms for lunch at each site were completed by February 1 and well documented.
4. Each school reviewed had a large water dispenser with cups for students to have water during lunch. Nice work!

### **Comments/Technical Assistance/Compliance Reminders**

#### Special Dietary Needs:

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the prototype Medical Statement for Special Dietary Needs posted on our website which is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to a students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- USDD added the updated Special Dietary Needs form, in English and Spanish, to the USDD website.

#### Professional Standards:

- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff) name of training, and where the training was taken from (i.e. USDA webinar, DPI SNSDC course, etc.). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

### **Findings and Corrective Action Needed**

❑ **Finding #1:** An incorrect version of the USDA non-discrimination statement is printed on the menus and other signage used for the National School Lunch Program and School Breakfast Program.



**Corrective Action Needed:** Update the menus and signage to have the current non-discrimination statement: This institution is an equal opportunity provider. Submit a screenshot or picture by email to show this has been completed.

❑ **Finding #2:** Missing the Time as a Temperature Control SOP for each site that has cold food out for meal service and is not being mechanically refrigerated.

**Corrective Action Needed:** Add the Time as a Temperature Control SOP to each Food Safety Plan. Submit an email to stating this has been completed.

❑ **Finding #3:** The breakfast on-site monitoring forms were not completed by February 1.

**Corrective Action Needed:** Complete the breakfast on-site monitoring forms and scan/email copies of each to show this was completed.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Commendations**

1. The USDD participates in Farm to School by offering a different seasonal fruit or vegetable as the Harvest of the Month. For January and February they offered a “Green and Gold Smoothie” that featured spinach, banana, and pineapple juice. Seventy classrooms with 1,000 plus students get 5 presentations a year regarding Farm to School. The videos and PowerPoint presentations are provided by Live 54218, but the Food Service staff presents these materials to the classrooms. USDD also purchases vegetables from a local vendor, Ledgeview Gardens, to receive vegetables throughout the year that they serve on their lunch menus at the schools. To combat food waste, the district collects fruit and vegetable scraps from the schools and gives it to Ledgeview Gardens to feed their chickens. Each Elementary school in the district has their own garden. Last year, Altmayer Elementary used the zucchinis from their garden to make chocolate zucchini muffins for the 4<sup>th</sup> graders.

### **Comments/Technical Assistance/Compliance Reminders**

1. The USDD website has a link to the Green Bay School District’s summer meals programs. USDD is also interested in starting the Summer Food Service Program at one of their sites this summer.
2. Currently, the School Breakfast Program(SBP) is being operated in 3 of the 6 schools at the USDD. It is operated at the High School, Middle School, and Foxview Intermediate. The Food Service Director is working on starting the SBP at Dickinson Elementary next school year.
3. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

[https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary\\_finalrule.pdf](https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf). USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).



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